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February 6, 2024

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By **March 5, 2024**, the parties shall dismiss the case or otherwise file a joint letter updating the Court on the status of their settlement discussions.

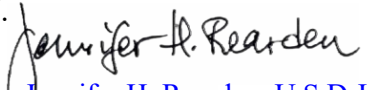
In light of the parties' ongoing efforts to resolve this matter, Plaintiff's motion for a default judgment is hereby denied without prejudice to refile if a settlement is not consummated by March 5, 2024.

VIA ECF

The Clerk of Court is directed to terminate ECF Nos. 20, 22, and 33.

Honorable Jennifer H. Rearden  
United States District Judge, S.D.N.Y.  
500 Pearl Street  
New York, NY 10007-1312

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.  
Date: February 15, 2024

Re: Bell Northern Research, LLC v. Shenzhen Tinno Mobile Technology Corp. et al.,  
Case No. 1:23-cv-07583: Request for Extension of Time

Dear Judge Rearden:

We represent Tinno USA and are writing, after conferring with Plaintiff's counsel, to jointly request a brief stay of the litigation to facilitate settlement of this dispute.

On February 5, 2024, the parties executed an Amendment to Settlement and Patent License Agreement providing for a certain payment by February 29, 2024, and that following payment, the parties will jointly move to dismiss the case.

According, the parties request that the Court stay the litigation for one month, through March 5, 2024, vacate the current deadlines for Tinno USA to respond to the Complaint (February 16, 2024) and to oppose Plaintiff's Motion for Default Judgement (February 16, 2024), and order the parties to dismiss the case or otherwise update the Court by no later than March 5, 2024.

Tinno USA twice previously requested that the Court extend Tinno USA's deadlines to respond to the Complaint and Motion for Default Judgment and those requests were granted. The proposed stay will not impact any other deadlines in this this matter.

Respectfully submitted,

/s/ Kyle Mooney

Kyle Mooney